Waste Reduction Office
Initiatives Paper No. 2

WASTE MANAGEMENT PLANNING IN ONTARIO

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Waste Reduction Office Initiatives Paper Series

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PREFACE

This Initiatives Paper presents proposed changes to the Waste Management Master Plan program. This program is being revised to reflect the recommendations put forward by those who have had experience with the program, and to incorporate the philosophy and initiatives of Ontario's Waste Reduction Action Plan announced in February, 1991 by the Minister of the Environment.

This paper is being widely distributed as a means to consult with the many stakeholders interested in municipal waste management planning.

If you wish to make written comments on this paper, please submit your comments to the address below. See also the centrefold comment form.

Send your comments to:

Initiatives Paper 2
Waste Reduction Office
Ministry of the Environment
135 St. Clair Avenue W.,
Toronto, Ontario M4V 1P5

All submissions received will be given careful consideration by the Ministry of the Environment in finalizing the program. A summary of comments received, how they were incorporated, and an explanation if they were not incorporated will be prepared, so that all participants will know how their input has affected the decision-making.

Additional copies of this document may be ordered from the Ministry of the Environment, Public Information Centre at (416) 323-4321.

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1.0 INTRODUCTION

This paper is the second in a series of Initiatives Papers issued by the Waste Reduction Office which was created as part of the **Waste Reduction Action Plan**, announced by the Honourable Ruth Grier, Minister of the Environment on February 21, 1991. Initiatives Paper No. 1 outlines regulatory measures to achieve Ontario's waste reduction targets. A companion discussion paper published by the Ministry of Municipal Affairs will outline options for legislative changes to empower municipalities to plan and operate waste management systems. Other papers are planned for release in 1992 to address related waste management topics, such as financial systems for 3Rs - reduction, reuse, and recycling - activities and marketing strategies.

Another Ministry initiative that affects the restructuring of the Waste Management Master Plan Program, is the review of the *Environmental Assessment Act* and the EA process. Following extensive consultations with the public in 1991, the Environmental Assessment Advisory Committee has recently submitted their recommendations to the Minister of the Environment. The Minister's decision on EA reforms will provide further direction for the waste management planning process proposed within this paper.

This Initiatives Paper describes the proposed **Waste Management Systems Planning Program**, which will be phased in to replace the existing Waste Management Master Plan Program. The paper reflects input received from a wide spectrum of stakeholders during preliminary consultations, and has been prepared to seek further comments from study participants, the public, special interest groups, municipalities, professionals and industry involved in waste management planning.

1.1 Objectives

One step in the conversion of our consumer society into a conserver society is to make waste reduction the primary goal and activity of the waste management systems in Ontario. This Initiatives Paper proposes a restructured Waste Management Master Plan Program to support and encourage municipalities in the development and implementation of plans aimed at meeting and even exceeding the Province's waste diversion goals.

A complementary objective is to facilitate the search for disposal capacity for the waste remaining after 3Rs efforts have been

maximized. The Province will give more direction which will provide planning groups with greater certainty throughout the process, resulting in time and cost savings.

For those municipalities presently planning under the Waste Management Master Plan program, "Bridging Plans" will be developed for each study to assist in making any necessary changes to the workplan. Please refer to Section 4.0 for more information.

1.2 Background

Planning for the comprehensive management of residential, industrial, commercial and institutional wastes at the regional level in Ontario began in the 1970s. The Waste Management Master Plan Program was introduced in 1982, as an extension of the Area Waste Management Studies.

The present Waste Management Master Plan (WMMP) process is a three-stage process which results in the development of a long-term (minimum 20-year) waste management system including sites. This basic goal has not changed for the proposed program. The WMMP program has been used primarily as a means for municipalities to undertake an environmental assessment process for new disposal capacity which usually requires review and approvals under the *Environmental Assessment Act* and *Environmental Protection Act*. This approach has resulted in less serious consideration of diversion of a portion of the waste stream.

Advisors from three Ministry of the Environment branches have been assigned to each waste planning study and have attended meetings regularly. Yet, little written guidance has been provided in support of the program with the exception of some *Environmental Assessment Act* policies and guidelines developed over a period of years. Guidance given verbally by one Ministry representative was sometimes unclear and inconsistent with the guidance provided by another.

A number of additional issues and difficulties with the program and its implementation have been identified by various groups and individuals involved in waste management planning.

Issues identified

The major issues are:

- Opposition raised in siting landfills under the Environmental Assessment (EA) process;
- A fluctuating regulatory environment;
- Evolving expectations of the requirements of the environmental assessment process;
- Little certainty in the process;
- Lack of provincial leadership;
- Inadequate public consultation early in the process;
- Lack of clarity in the process and lack of process guidance; and,
- The great time and expense involved in completing studies.

Many initiatives are being undertaken by the Province, in consultation with interested parties, to address some of these issues and improve the planning and implementation of systems for managing waste. Some of these initiatives are described below.

AMO

The Association Of Municipalities of Ontario (AMO), through its report *The Waste Management Planning and Approvals Process* (March 1989), played an important role in identifying planning and other issues. Subsequent to the completion of their report, a joint MOE/AMO/Ministry of Municipal Affairs (MMA) committee was established to review the report's recommendations, which have been considered in the current restructuring process.

Municipal responsibility

It is recognized that municipalities are often the final repository for waste and carry significant responsibility for contributing to the achievement of the Provincial waste diversion targets. Therefore, municipalities must plan for not only residential waste but also for non-hazardous industrial, commercial and institutional (IC&I) waste. However, the responsibility for diversion can be fulfilled only if municipalities are adequately empowered to undertake 3Rs activities and manage the residual waste stream. The Ministry of Municipal Affairs will be consulting on options for such changes to municipal legislation in a companion discussion paper.

Ministry of the Environment

The existing Waste Management Master Plan Program has not adequately emphasized waste reduction, reuse and recycling in the management of municipal, industrial, commercial and institutional wastes. A new approach is needed to make the program reflect the Ontario Government's emphasis on waste reduction, and to provide clear guidance to communities to develop comprehensive, coordinated plans for all waste generated.

Provincial targets

The provincial government has set targets of at least 25 percent reduction of waste going to disposal in 1992, and at least a 50 percent reduction by the year 2000. However, these targets will not likely be achieved uniformly throughout Ontario. Waste generation rates vary from community to community. While some rural and northern municipalities may not be able to achieve the waste reduction targets, many urban municipalities will be able to exceed these targets. Ultimately, each municipality should assess its situation and maximize its contribution to the provincial targets.

The reader is referred to Initiatives Paper No. 1, *Regulatory Measures to Achieve Ontario's Waste Reduction Targets* (October, 1991), for a description of regulatory measures being proposed for both the public and private sector to help achieve Ontario's waste reduction targets. The impacts of the proposed regulations include the following:

- Approvals for recycling sites will be clarified and streamlined;

- Major industrial, commercial and institutional (IC&I) waste generators will be required to implement source separation (recycling) programs, waste and packaging audits and workplans; and,

- Most municipalities will be required to implement source separation and leaf and yard material composting programs.

Incineration banned

In April 1991, the Minister of the Environment announced a ban on the construction of future municipal solid waste incinerators in Ontario, including energy-from-waste (EFW) facilities and refuse-derived fuel using municipal waste. A regulation is being developed to support this announcement.

Together, the incineration ban and the proposed waste reduction regulatory measures should begin to clarify for planners of waste management systems, the waste management components that should or should not be included. This puts the emphasis for 3Rs planning on successful 3Rs implementation. In this area, municipal governments

and the community have the primary responsibility and will continue to provide the innovation in developing effective 3Rs programs.

Revised program to be consistent with revisions to EA Act and EA process

The Ministry of Environment has reviewed the *Environmental Assessment Act* (EAA) and EA process, with a view to making it more effective and efficient. The Environmental Assessment Advisory Committee (EAAC) coordinated a public review of the report *Towards Improving the Environmental Assessment Program in Ontario* (December 1990), and has recently made its recommendations to the Minister of the Environment. These reforms, together with the results of public input to Initiatives Paper No. 1 and the Ministry of Municipal Affairs discussion paper, will complement the Waste Management Systems Planning Program.

All of the initiatives outlined above, together with other planned initiatives, will assist the Province in addressing the problems associated with waste management planning and will facilitate waste management approvals and implementation by municipal governments.

2.0 THE WASTE MANAGEMENT SYSTEMS PLANNING PROGRAM

Program objectives

The proposed Waste Management Systems Planning (WMSP) Program is designed to assist municipalities to develop a comprehensive, long-term (minimum 20 years) system for the management of municipal wastes, including IC&I wastes, within a specified planning area. The Ministry's objective in offering the program are:

- To ensure the development of sustainable waste management systems which will, collectively, exceed provincial objectives for waste diversion and provide for environmentally sound waste disposal;

- To assist municipalities to undertake proper planning in accordance with the *Environmental Assessment Act*, policies and guidelines; and,

- To provide a planning process that leads to an accelerated implementation of 3Rs activities, systems and facilities.

- To encourage group (more than one municipality) planning, development and implementation of environmentally sound waste management facilities that can be better developed and managed by the

pooling of resources within a group.

What is a waste system?

A municipal waste management system consists of the following components:

- Waste collection
- Waste diversion from disposal; and
- Waste disposal

What is a waste system plan?

A Waste Management System Plan is a blueprint for a municipality to administer, finance, implement and monitor an integrated system for managing its waste. A plan describes the system, its components and component facilities. It also documents the planning and decision-making process and will be submitted in support of an EA or be submitted for EA approval.

Why plan?

In order to encourage municipalities to develop long-term plans for sustainable waste management systems and work toward achieving provincial waste reduction targets, the Province assists municipalities with a shared-cost funding program. A diversion strategy, developed within the planning process, must be submitted to the Ministry of the Environment for approval in order to obtain Ministry of the Environment funding for 3Rs facilities such as recycling and composting sites. Planning is also essential to obtain approval of waste management facilities under the *Environmental Assessment Act*.

Who should plan?

All municipalities should, on an ongoing basis, review and plan for the management of all waste generated within their boundaries. Some municipalities may only need to implement or upgrade 3Rs systems and facilities. Others may also require additional approved disposal capacity. The Waste Management Systems Planning Program will apply in both situations.

The program is available to upper-tier municipalities and to groups of two or more lower-tier area municipalities (Some exceptions apply, such as for "isolated" municipalities).

Program and process features

The new Waste Management Systems Planning Program has the following features:

- Accelerated 3Rs implementation;

- Two-stream planning which ensures that development and approval of a sound waste diversion strategy may proceed expeditiously *prior* to approval of new disposal facilities (see Figure 1);

- An EA guidance/decision point (see Figure 1) may be provided as part of the planning process of a Waste Management System Plan to provide certainty before proceeding with the site selection for any facility requiring EA approval. This EA guidance/decision point, if incorporated as part of EA reform will occur prior to selecting the preferred site and formal EA approvals.

- Detailed guidance and support materials in the form of generic study *Terms of Reference* (Appendix C), a *Provincial Policy Reference Guide for Municipal Waste Management Planning* (Appendix A) and a *Guide to Municipal Waste Management Planning* (Appendix B);

- One window/one voice MOE support for the program delivered through the Ministry's regional offices, providing more timely, consistent input (see Section 3.0, Roles & Responsibilities);

- Continued shared-cost funding to assist municipalities with waste management planning;

- Strengthened public consultation throughout the planning and implementation process, by providing clear guidance and direction for the development and implementation of an effective consultation program.

2.1 Funding and Eligibility

Program funding eligibility

The program applies to upper-tier municipalities (Regional Municipalities and Counties) and to groups of municipalities which join together for the purposes of developing and implementing a waste management system. Separated cities within or contiguous with a County are encouraged to participate in waste management system planning through agreements with their neighbouring upper-tier municipalities.

The program does not fund planning for single lower-tier municipalities unless they qualify as part of an "isolated study area". One or more lower-tier municipalities may be considered an "isolated study area" if they are entirely surrounded by unorganized areas.

To qualify for provincial funding, the planning process must follow the generic "Waste Management Systems Planning Study Terms of Reference" described in Appendix C. The plan must reflect a hierarchical 3Rs approach, with the primary focus on waste reduction. In addition to funding costs of consultants and public consultation activities, the program also funds the costs of the study coordinator/project manager.

Funding needs

The Ministry of the Environment recognizes and supports the need for enhanced funding under the WMSP program for municipalities with small populations, particularly those in northern Ontario. The Ministry is working to develop an acceptable funding mechanism which should be determined by the time the WMSP Program is finalized.

Comprehensive funding

The Ministry is investigating the streamlining of funding programs to integrate the programs covering planning through to EA/EPA submissions for approval. The outcome of this investigation will be reflected in the finalized process.

2.2 Waste Management System Planning and Review Process

Consistent with EA Act

Consistent with processes established under the *Environmental Assessment Act*, the Waste Management Systems Planning process incorporates:

- Early and effective consultation with the public;
- Consideration of alternatives;
- Consideration of all aspects of the environment and the identification and evaluation of net environmental effects of all components as part of the evaluation of the waste systems; and,
- Clear, comprehensive documentation of the planning and decision-making process.

Two-stream process

A two-stream planning process is envisioned for developing the Waste Management System Plan. To facilitate planning for an integrated system (diversion and disposal), the two-streams may be undertaken concurrently after the completion of Task 1. Where only a diversion system is planned, in the event that no additional disposal capacity is required for the projected planning period, the top stream

will comprise the planning (non-EA) process.

Figure 1 graphically displays the process, showing the five tasks, the proposed guidance and approvals points and how they relate to each other. A detailed description of the tasks can be found in *Appendix C: Draft Terms of Reference for a Waste Management System Planning Study*. The tasks are described briefly below.

Task 1: Assessment of Problems and Opportunities

Identify diversion opportunities, and waste quantities to be managed

This task will include definition of the study area boundaries; collection of baseline information such as present population and growth projections, descriptions of the natural, economic, social and cultural environments; and current planning instruments and policies. In addition, this phase of the study will describe the current waste management system for municipal solid waste, including residential and IC&I waste; identify projected waste generation rates, opportunities for markets to divert waste from disposal, and the waste quantities requiring management.

Set waste reduction targets

In consultation with the Study's Steering Committee and the public, attainable waste reduction targets will be set and the resulting quantities of waste to be diverted from disposal and the remaining residuals to be disposed of, will be calculated.

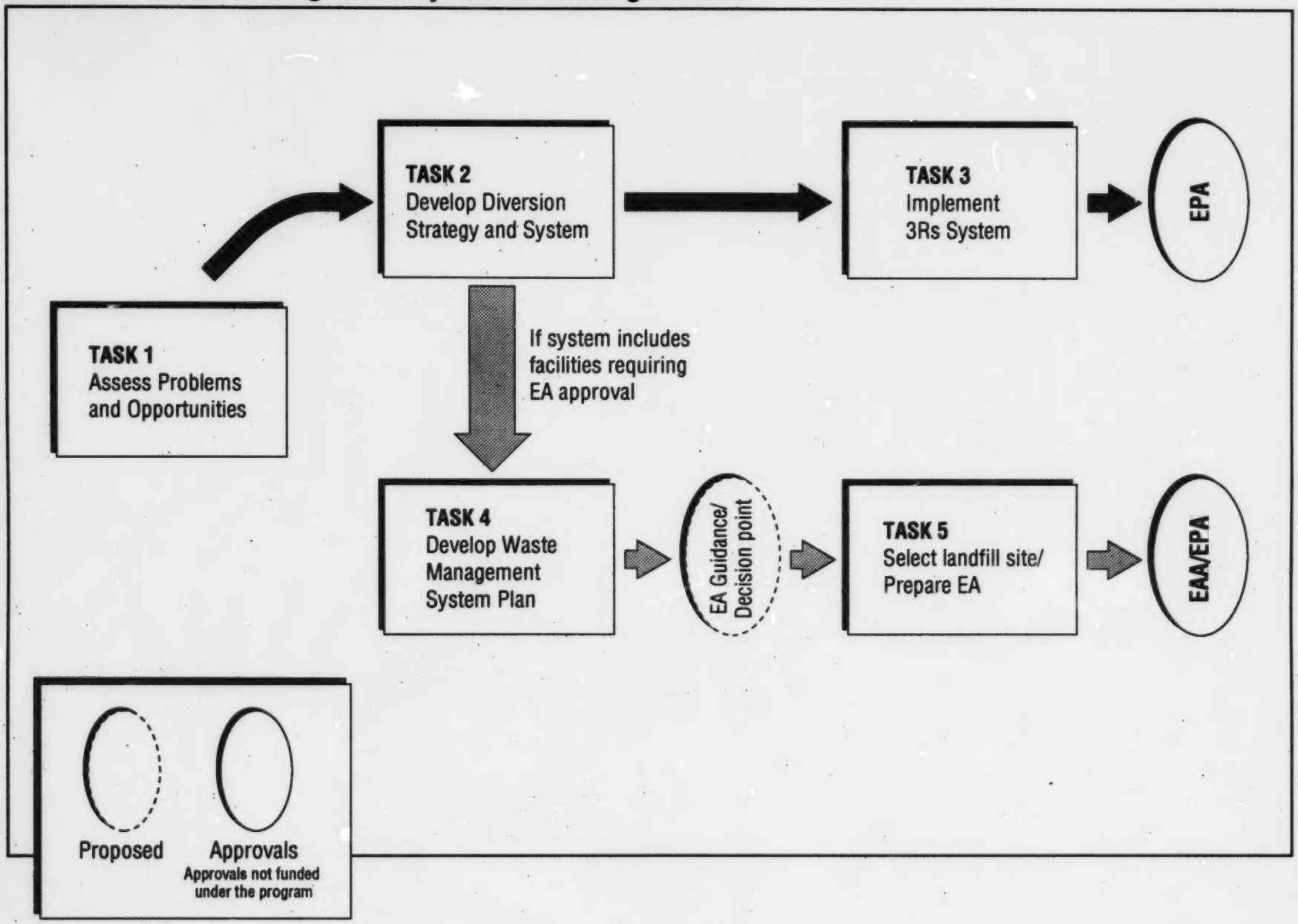
An "Assessment of Problems and Opportunities" report will be prepared at the conclusion of this task.

Public involved from outset

During this phase of the study, public consultation activities will:

- Introduce the study and develop awareness of waste diversion options and initiatives in the study area;
- Clarify the role of the public and agencies in the consultations for the evaluation stage of the study; and,
- Involve the public in the development and implementation of 3Rs activities that may be initiated during the study.

FIGURE 1: Waste Management Systems Planning Process



Task 2: Development of the Waste Diversion Strategy

A waste diversion strategy identifies specific 3Rs (reduction, reuse and recycling) programs and facilities that will help to achieve the waste reduction targets of a study area.

Identify appropriate 3Rs components

The Ministry of the Environment will provide generic screening criteria for determining the suitability of components (eg. home composting, blue box collection, centralized composting, material recycling programs and reduction and reuse promotion). Some components will be required (e.g. source separation and leaf and yard composting programs) through provincial regulation. Through a consultative process with public and agency input, the appropriate components will be selected.

If the need for additional disposal capacity is identified in Task 1, then the diversion components will be combined with the disposal option(s) to develop alternative system(s). An analysis that satisfies the requirements of the *Environmental Assessment Act* will be undertaken and the preferred system will be identified. Once approved by the Steering Committee, this system will be the backbone of the Waste Diversion Strategy.

Implement 3Rs activities as soon as possible

It is emphasized that many 3Rs activities which do not require significant new facilities (eg. home composting, blue box programs, household hazardous waste days) should be implemented or expanded immediately, without awaiting completion of the Waste Diversion Strategy (see Appendix D).

EAA or EPA approval?

According to current Ministry of Environment policy, a waste processing facility can enter two alternative approval streams, depending on the amount of waste residue generated by the facility (see Appendix D). Specifically, if more than 200 tonnes per day of process residue goes to disposal, then the facility must receive approval under the *Environmental Assessment Act* (EAA) and *Environmental Protection Act* (EPA). If less than 200 tonnes per day of process residue goes to disposal, then only the *Environmental Protection Act* (EPA) applies. However, a request can be made to the Minister to require the application be subject to the EAA.

3Rs facility site selection methodology

In addition to developing the system, this task includes the development of a methodology to select sites for specific recycling/waste processing components of the diversion system. The

basis for developing the methodology will be provided in the *Guide to Municipal Waste Planning*. However local input into the process will be required. If the EAA does not apply, this methodology should incorporate generic site selection criteria, where available, and/or study-specific criteria developed with public input. If the EAA applies to the project, then a site selection process would have to follow the EA planning process and fulfill the requirements of the EAA. This process would be the same as that for the landfill site, and should be developed as part of Task 4.

Municipal implementation of 3Rs facilities for IC&I waste

In order to achieve the 25% and 50% diversion targets, many municipalities will choose to set up 3Rs facilities that accommodate IC&I waste. For effective implementation of these integrated facilities, refer to a discussion paper on municipal waste management powers released concurrently with Initiatives Paper 2 by the Ministry of Municipal Affairs.

Diversion Strategy

The resulting Waste Diversion Strategy will include:

- Documentation of the 3Rs strategy for the study area;
- Documentation of the selection of the preferred system, including the analysis of "alternatives to", as required;
- Description of the preferred system, including waste quantities being diverted and disposed of;
- Description of 3Rs facility siting methodology and criteria;
- The monitoring program to be followed to track the diversion being achieved; and,
- The implementation procedures and schedule to be followed.

Strategy Approval for MOE funding

Waste Diversion Strategies must be submitted to the Ministry of the Environment as supporting documentation in order to be eligible for ministry funding of 3Rs facilities. The Ministry will review the Waste Diversion Strategy in light of planning and 3Rs objectives along with criteria for eligibility for the specific funding programs. Clear requirements for this review will be provided in the *Guide to Municipal Waste Management Planning*. A positive review of the Waste Diversion Strategy will be a condition of subsequent approvals, and may lead to an EA exemption of some 3Rs facilities.

Study groups are encouraged to proceed with Task 3: 3Rs System Implementation, concurrently with the development of any needed facilities that require EAA approval.

Task 3: 3Rs System Implementation

Implement 3Rs

In this task, the activities and programs identified in Task 2 should continue to be implemented and improved. The approvals required will be outlined in the *Guide to Municipal Waste Management Planning*.

EPA level approval for 3Rs facilities

The approach developed in Task 2 for the siting of 3Rs facilities is applied to identify their locations for construction and operation. Public involvement continues throughout this phase. The results of the siting process should be documented in a report for the approval of the Steering Committee and appropriate municipal councils.

Following municipal approval of the preferred site(s), final approval of these facilities will be required under the *Environmental Protection Act*, either by Certificate of Approval or "Permit by Rule" (a simplified approval process for certain 3Rs facilities, as described in Initiatives Paper No. 1). Some waste processing and transfer facilities may also require approval under the *Environmental Assessment Act*, if over specific waste quantity threshold levels (appendix D).

Task 4: Development of the Waste Management System Plan

Where a facility requiring approval under the *Environmental Assessment Act*, such as new landfill capacity or a 3Rs facility whose capacity exceeds threshold levels (Appendix D) is proposed as part of the system the completed Waste Management System Plan will form part of the rationale for the subsequent environmental assessment of the facility or plan, insofar as it addresses the issues of **need, waste quantities, study area** boundaries, and **alternatives** to the undertaking in accordance with the *Environmental Assessment Act*. To this end, it will be used as supporting documentation and planning information throughout the remainder of the process and will be incorporated into the EA documentation when seeking EAA approval.

Siting methodology developed and approved before site selection

Most municipalities will require approval of only landfill capacity under the *Environmental Assessment Act*. The methodology for selecting a landfill site will be developed in close consultation with the public and review agencies. The Ministry of the Environment will provide clear guidance and direction on siting to assist study groups in this task while allowing for the integration of local priorities. The methodology for selecting a site will be documented in a report that will include:

- A comprehensive consultation plan;
- A description of the approach to site selection, the exclusion and evaluation criteria, the data sources and the method of analysis being proposed;
- A preliminary list of issues and concerns to be addressed; and,
- A list of studies to be carried out.

This report provides the documentation of the site selection process and the associated public consultation activities planned for Task 5, "Landfill Site Selection".

Comprehensive system plan

The Waste Management System Plan will integrate the implementation practices and schedule with the Waste Diversion Strategy (Task 2) for a comprehensive municipal waste management system. The completed System Plan will include the following:

- Detailed description of the system, including all municipal 3Rs (reduction, reuse and recycling) programs and facilities existing and proposed, and the proposed capacity requirements for landfill facilities;
- The process followed for the identification of the preferred system;
- Recommended changes to current financial and administrative practices;
- Official Plan and zoning amendments, if required;
- Recommended plan for financing of the system development and operation;

- Implementation schedule for development and approvals of facilities;

- Procedure for monitoring and updating the waste diversion strategy and system plan, including methods of monitoring of waste quantities (diversion and disposal), composition, population, waste generation rates and criteria or guidelines for incorporating new technologies into the waste management system. The monitoring data collected through this procedure should be used to update the plan on a regular basis.

EA Guidance/ Decision Point

After appropriate public consultation, the WMSP document will be finalized and adopted by the Steering Committee and the appropriate Municipal Councils. The adopted Waste Management System Plan, together with the Site Selection Methodology Document will be submitted for review under the *Environmental Assessment Act*. Comprehensive changes to the EA process have not yet been implemented (they are expected later in 1992), therefore it is premature to state the form that the Ministry or Environmental Assessment Board input or approval might take. The proposed positioning of the guidance/decision point in the process also may change as a result of EA reform.

Task 5: Site Selection and EA Documentation

EA approval for landfill

In this phase of the study, the landfill site selection methodology developed in Task 4 is applied to the study area to identify a preferred location for new landfill capacity. Good planning, including public consultation, will continue throughout, as described in the methodology approved in Task 4.

The results of the site selection study will be documented in a manner demonstrating that a sound planning process has been followed and is consistent with the *Environmental Assessment Act*.

The Waste Management Systems Planning Program funding concludes once the EA applications are submitted to the Minister of the Environment.

2.3 Direction and Guidance

Stronger Ministry guidance

The Ministry of the Environment will provide detailed guidance to municipalities and the public through the preparation a *Study Terms of Reference* (see Appendix C) and two reference manuals:

Detailed Guides

- *Provincial Policy Reference Guide for Municipal Waste Management Planning* (see Appendix A): and,

- *Guide to Municipal Waste Management Planning* (see Appendix B).

These guides include such information as: detailed program and process description, guidelines and generic information that can be used by all studies.

3.0 ROLES & RESPONSIBILITIES OF STUDY PARTICIPANTS

Study coordinator role may expand, consultant's role may diminish

The roles of Steering Committees, Public Liaison Committees, study coordinators, consultants and the public are not significantly changed. There is an opportunity for the study coordinator to take on a larger project management role. The study coordinator may be a municipal employee or a contract position. Depending upon the expertise of the study coordinator/project manager, and the municipal resources available, the consultant's role could be reduced. Municipalities may, however, wish to continue to engage a multi-disciplinary team of consultants.

One window/ one voice service

Following a transitional phase-in period of training, a study advisor responsible for program delivery will be established in each of the six MOE Regions. Through this advisor, the MOE will provide a *one window/one voice* service to Steering Committees preparing Waste Management System Plans, instead of the present method of having three Ministry of the Environment representatives advising Committees. To fulfil this role, the study advisor will:

- Attend meetings of the Steering Committees, Technical Advisory Committees and Public Liaison Committees as required;

- Co-ordinate all Ministry input to the study, including input from Regional staff, Waste Reduction Office, Environmental Assessment

Branch and Approvals Branch; and,

- Ensure consistency of Ministry advice and guidance.

Full Ministry support to the Study Advisor

The Waste Reduction Office (WRO) will carry responsibility for:

- Program development and monitoring;
- Consistency in program delivery;
- Program budgeting and finance;
- Ongoing program education, information and communications needs;
- Study start-ups in conjunction with the Regional study advisors;
- Providing a mechanism for special services such as mediation, conflict resolution, or independent reviews.

Environmental Assessment Branch staff will advise on specific matters related to the *Environmental Assessment Act*, policies and regulations. This advice will be provided through the Regional study advisor.

Approvals Branch staff will be involved in the review and approvals process for plans and facilities requiring EAA and EPA approvals.

4.0 IMPLEMENTATION

It is recognized that many municipalities are currently in the process of developing a Waste Management Master Plan (WMMP) under the former planning process. Accordingly, implementation of the new program will have to be tailored to each study group depending upon the work already carried out and commitments made. To that end, Ministry of the Environment, through the Municipal Waste Planning Unit of the Waste Reduction Office, is currently reviewing all WMMPs and, in consultation with the Steering Committees, Public Liaison Committees, Study Coordinators and consultants, will assist in the preparation of "Bridging Plans", where appropriate. The intent of the Bridging Plans is to bring studies into compliance with the new program as quickly as possible.

Bridging Plans

The following guidelines have been developed to provide the basis for study-specific Bridging Plans:

1. Studies which are just beginning or have not yet completed Stage 1 of the WMMP process, will revise their Terms of Reference and follow the two-stage process under the new program. Participating councils should pass a resolution adopting the revised Terms of Reference, and consultants should provide the Steering Committee with a revised workplan, schedule and budget.

2. Due to the complicated nature of Stage 2 WMMP studies, the Ministry will work closely with municipalities and study teams to develop Bridging Plans and a revised workplan for studies currently in this stage of the process.

3. Studies currently in Stage 3 (system work completed, candidate sites ranked or preferred site selected) should proceed as outlined in the current WMMP program. System evaluation and selection should be completed as expeditiously as possible, and diversion components not requiring EA approval should be implemented as soon as possible. A new workplan, schedule and budget may be required to facilitate diversion facility siting.

5.0 SUMMARY

Although changes to the Ministry's waste management planning program in itself cannot resolve all the difficulties experienced by participants in the process, the Waste Management Systems Planning Program, including the guidance manuals being developed as part of the program, should provide a much greater level of assistance and certainty than currently available.

The *Provincial Policy Reference Guide* will assist Planning participants by providing the framework for development of waste management systems. The generic material and direction included in the *Study Terms of Reference* and the *Planning Guide* will provide a better understanding of the process and reduce the work required by each study group. Direction on how to achieve effective consultation with the public will also be provided within the guides. This direction should reduce the time and high costs of planning accordingly.

The EA guidance/decision point, which will be further clarified following the completion of the EA reform process, will provide greater certainty about "being on the right track" throughout the process. The Ministry will improve its service to each WMSP study group through better program delivery, guidance and funding.

APPENDIX A

PROVINCIAL POLICY REFERENCE GUIDE TO MUNICIPAL WASTE MANAGEMENT PLANNING - SUMMARY -

This Guide should be used as a companion to the *Guide to Municipal Waste Management Planning* summarized in Appendix B. The Policy Guide will highlight key features of provincial legislation, regulations, policies and guidelines which should be considered when carrying out municipal waste management planning studies. The Guide will also assist private sector proponents in the development and approval of their waste management facilities.

The purpose of the Guide is to provide a document which:

- Outlines the provincial vision for waste management planning;
- Assists proponents, consultants, public interest groups and citizens to obtain an overview of provincial legislation, regulations, policies and guidelines to be considered when carrying out municipal waste management planning, including planning for diversion facilities and landfill sites;
- Can be readily updated as experience with the new process is gained, and to reflect changes in the legislation, regulations, policies and guidelines;
- Accompanies the *Guide to Municipal Waste Management Planning*.

The Guide is organized to provide easy reference. Each statute, regulation, policy or guideline description will include at least the following:

- Title and government body responsible;
- Brief explanation of how it relates to municipal waste management planning
- Key features relevant to the planning or design of waste management facilities;
- Direction on how to obtain more detailed information.

APPENDIX B

GUIDE TO MUNICIPAL WASTE MANAGEMENT PLANNING
- SUMMARY -

This Guide outlines specific tasks and related Ministry of the Environment requirements to assist study groups, the public and ministry staff involved in the development and implementation of long-term municipal waste management plans. Presented in loose-leaf binder format for easy updating, the Guide will contain the following:

Introduction

Describes the Waste Management Systems Planning (WMSP) Program, the nature and purpose of a WMSP study, and the public consultation requirements. This section also provides an overview of how the WMSP process relates to the Environmental Assessment Act.

Pre-planning - Getting Started

Part A of this section of the Guide outlines the twelve steps essential to initiating the WMSP process. These include:

- eligibility criteria for funding
- definition of the study area
- authorization of the study through Resolutions of Councils
- obtaining initial Ministry of the Environment advisory support, and making the funding request
- setting up a Steering Committee to guide the study
- hiring/appointing a study coordinator
- establishing a public liaison committee (PLC)
- developing terms of reference for the study
- hiring a consultant
- developing a public consultation plan
- preparing the study budget
- administration of the study and budgets

Part B of this section provides more information on some parts of the process described in Part A. For example, it describes in considerable detail the roles and responsibilities of the various players involved, and discusses County authority and Boards of Management (where the study is being conducted under an agreement among two or more municipalities). It also provides guidance on how to structure a budget, and how to hire a consulting team. The section concludes with a list of references for further information.

WMSP Process and Content

This section of the Guide provides a step-by-step description of the process to be followed in the development of a WMSP including public consultation, and what the product resulting from each step should contain. It includes:

- A description of what the **study scope** should include;
- A statement of the minimum **study objectives** required to meet funding criteria;
- An overview of the five task **work program** leading to completion of the Plan (see Figure 1);
- A detailed description of the **five tasks**:

  - assessment of problems and opportunities
  - development of the Diversion Strategy
  - implementation of 3Rs components
  - development of the Waste Management Systems Plan including the landfill site selection methodology
  - landfill site selection

- A description of appropriate methods of **public consultation** and indication of when these should be used throughout the WMSP process.

Implementation and Monitoring

This section of the Guide provides guidance on implementation of the selected and approved plan, with particular emphasis on the monitoring provisions which should be included in the Plan. It describes how the Plan should be updated, who should be involved in monitoring facility implementation and how they should be involved.

Approvals

Referring to the legislation and regulations detailed in the *Policy Reference Guide*, this section leads the reader through the specific steps required to gain approval for the following facilities:

- home composting programs
- at-source separation/blue box programs
- depot recycling
- landfill
- transfer stations (including their siting)
- household hazardous waste collection depots
- waste processing sites (eg. centralized composting plants)

Generic Content

This section provides planners with a detailed description of **known waste management processes and technologies** potentially acceptable for use in Ontario. It also provides **generic minimum criteria** for waste management systems and facility siting.

The Guide concludes with a **Glossary of Terms** commonly used in the Guide and in waste management planning.

Appendices

The following information appendices complete the Guide:

1. Ministry WMSP Fact Sheet
2. List of non-governmental contact organizations
3. Sample Board of Management Agreements
4. Discussion of Application of County Authority
5. Model municipal by-laws for study implementation
6. Guide to tailoring generic Terms of Reference to suit specific study areas
7. Guide to hiring consultants
8. Public consultation methods
9. Sample compensation policies
10. List of waste management funding programs available
11. Discussion of participant and intervenor funding
12. List of markets for re-usable/recyclable materials
13. Discussion of key Environmental Assessment Board decisions
14. List of available education/information material

APPENDIX C

DRAFT TERMS OF REFERENCE: WASTE MANAGEMENT SYSTEMS PLANNING STUDY

1. INTRODUCTION

1.1. The Study:

A waste management systems planning study is designed to develop a comprehensive long-term (minimum 20 years) system, based on a waste diversion strategy, for a specific planning area. As necessary, an integrated system will be comprised of a waste diversion system (incorporating waste reduction, reuse and recycling approaches and components) and may also include a disposal system for waste residuals.

1.2. The Plan & EA Submission:

The study may be either a single-stream 3Rs diversion planning process, or a two-stream diversion and disposal process, which then fulfils the requirements of the Environmental Assessment Act. The process includes specific tasks and activities which can be undertaken simultaneously, as necessary. The study will result in the development and preparation of the following documents:

(a) A 3Rs Diversion System Strategy:

The development of a 3Rs waste diversion strategy will be a phased identification, evaluation and selection of a preferred waste diversion system. The diversion system will be comprised of 3Rs components which have been assessed to be reasonable for the planning area. The objective of the strategy will be to achieve an accelerated implementation of municipal waste diversion programs and facilities.

Completed strategies will include: documentation of the quantities projected to be diverted from disposal; details of the selected diversion system; an outline of a procedure for the selection of sites for 3Rs facilities; and, a proposed program for implementing the system and monitoring waste diversion achievements. The diversion system strategy is submitted for Ministry approval.

(b) A Waste Management System Plan:

The waste management system plan (WMSP), if necessary, details the integrated system, comprised of the adopted diversion system strategy, and other components essential for a waste disposal system. The Plan presents a blueprint for the implementation, administration and financial management of the integrated system.

The WMSP also documents the 3Rs and EA planning and decision-making process which was undertaken, including the results of public consultation. The WMSP is submitted to the Ministry as part of an EA submission for review.

(c) A Site Selection Methodology Document:

A landfill site selection methodology document (SMD), details the selection and assessment methodology to be followed for the subsequent selection of the landfill site, is prepared based on a consensus of public input. This document is adopted by the Steering Committee and Councils. The selection of a preferred landfill site will proceed on the basis of the approved methodology.

If 3Rs facility siting is subject to EAA, a siting methodology will be developed in accordance with EA requirements.

1.3. Consultation:

Public and agency consultation throughout the planning and decision-making process is required from the outset. A Public Liaison Committee will be established by the Steering Committee before the study is initiated, to facilitate the required public consultation (for some smaller, isolated studies, a Public Participation Facilitator may be hired instead)

There are recognized benefits to obtaining government agency input, as with public input, as the study proceeds. An ad hoc agency advisory committee should be established early in the study.

In addition, a Study Coordinator/Project Manager may should be hired by the Steering Committee to assist the Steering Committee and the Public Liaison Committee in undertaking the study, including the consultation program (for smaller studies, the Study Coordinator may carry out the role of the Public Participation Facilitator).

2. STUDY GOALS/OBJECTIVES

The goals of this waste management systems planning study are to:

* develop a 3Rs waste diversion strategy, to accelerate 3Rs implementation throughout the study area, for .....;

* implement "at-source" 3Rs activities (both activities required to be implemented by Regulation and/or those activities not requiring either EAA or EPA approvals, such as at-source separation, home composting, etc.) as the planning proceeds;

* prepare a waste management system plan (if necessary) which will provide a comprehensive, long-term, integrated waste management strategy for the study area; and,

* select a waste disposal site(s) (if necessary).

The waste management planning process should meet the following basic study objectives/requirements:

(a) The wastes to be studied are all municipally generated wastes, including domestic, non-hazardous solid industrial, commercial, institutional and household hazardous wastes.

(b) The Plan must address the total system needs of the study area for a minimum 20 year period, with planning projections for 40 years.

(c) Waste diversion targets are to be established for the study area, based on Provincial waste diversion targets of at least 25% and 50% by the years 1992 and 2000 respectively.

(d) The planning process must accelerate implementation of 3Rs initiatives, programs and systems.

(e) The development of a process for disposal facility siting is to include the development of siting criteria, a consultation plan (public and agencies), and a systematic and consistent evaluation methodology.

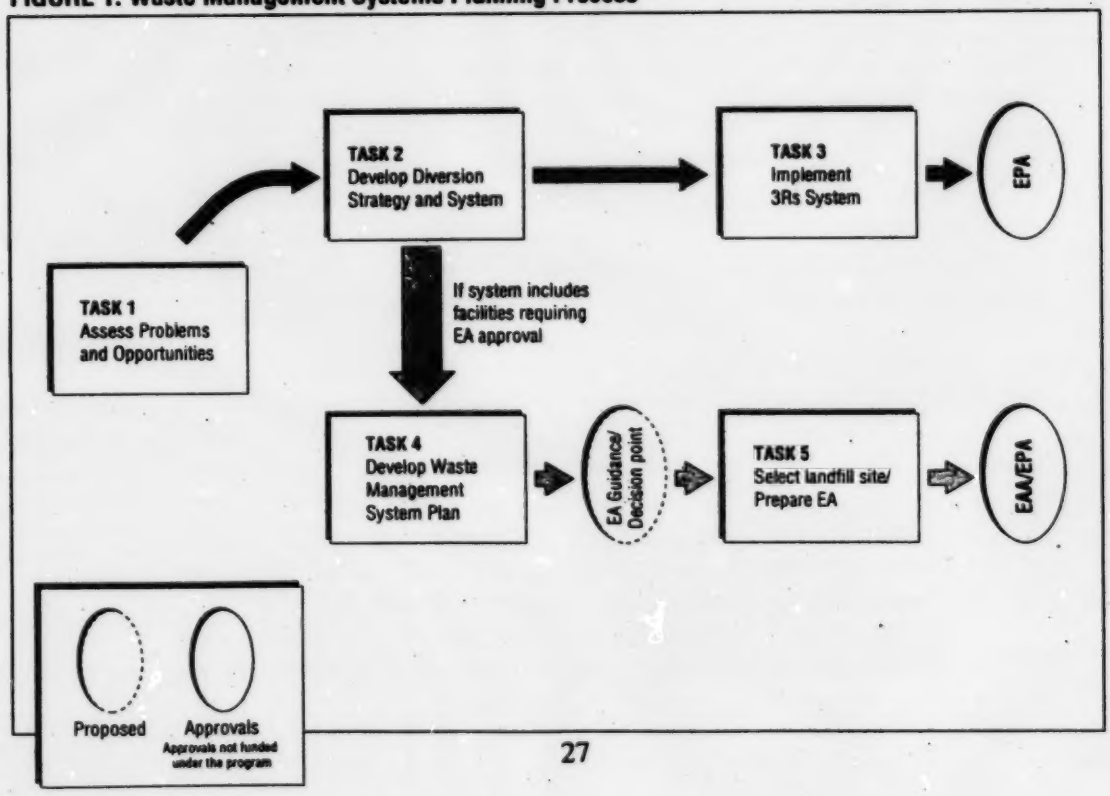
3. WORK PROGRAM OVERVIEW

3.1. Planning Process:

The waste management systems planning process, including 3Rs strategy and action plan development and landfill site selection, is depicted below (Figure 1). The MOE planning program covers funding from pre-planning activities through to the development of documents needed for EAA approvals. The planning study outlined in this work program is comprised of 5 tasks. The process is outlined as a two stream work program including the following tasks:

Task 1:	Problems and Opportunities Assessment
Task 2:	Diversion Strategy and System Development
Task 3:	3Rs System Implementation
Task 4:	Waste Management Systems Plan Development
Task 5:	Landfill Site Selection/EA Preparation

FIGURE 1: Waste Management Systems Planning Process



4.0 TASK 1 - PROBLEMS AND OPPORTUNITIES

This phase of the study is intended to: define and describe the study area and its "environment"; assemble baseline data and information, and develop projections; establish a rationale for future needs, and an initial foundation for system implementation (e.g. formation of policies, agreements, legal entities or authorities); and, identify immediate needs and requirements for the study area.

Public consultation at this stage is essential to:

- appropriately introduce the study;
- initiate a consultation program which will ensure adequate public input into the study;
- identify the role of public and agency consultation in the evaluation stage of the work;
- develop public awareness and education programs;
- involve the public in the development and implementation of any 3Rs activities which may be initiated while the study is proceeding; and,
- verify the Task 1 data.

4.1. Study Boundaries:

Clearly confirm/define, and describe, the boundaries of the study area. This will establish the boundaries for the duration of the study, and define the planning and service area.

If the proposed study boundaries do not coincide with municipal boundaries, the definition of the study area will need to be developed through a traceable process involving public consultation. Through this process, a number of factors essential to the delineation of a boundary will be established and applied.

4.2. Baseline Information:

Document general "baseline" information about the study area including:

- demographics;
- population and growth projections;
- natural environment;
- social, cultural and heritage environments;
- present and proposed land uses, economic developments and projections;

- transportation systems and future transportation and utility corridors;
- existing planning instruments and policies.

Information sources, including maps, should be clearly identified and referenced.

4.3. **Define the Current Waste Management System:**

i) **Waste Sources**: Collect and analyze data concerning waste types, composition and quantities, current waste generators and current waste generation rates.

ii) **Waste Management Practices and Programs**: Document public and private sector systems, methods, and programs (including cost data), currently used within the study area for waste reduction, reuse, recycling, collection, transfer, transportation and disposal, and assess current waste diversion rates and 3Rs practices.

iii) **Waste Management Facilities**: Identify the existing waste management facilities within the study area, and provide documentation in terms of their: present use; approved capacity; present or potential operational difficulties; potential for expansion; and, present impact on the receiving environment, if any.

iv) **Other Planning Studies**: Identify and discuss any ongoing public or private sector planning studies adjacent to the study area, in terms of possible interaction with respect to 3Rs opportunities.

v) **Secondary Materials Markets**: Identify current available markets and market conditions for recycled materials (information may be available through the MOE).

4.4. **Waste Management Projections:**

i) **Future Waste Generation Rates**: Estimate, and rationalize, future waste generation rates and quantities to be managed based on population and economic growth projections.

ii) **Waste Diversion Rates**: Based on a traceable rationale, establish projected waste diversion rates for the study area, in consultation with the Steering Committee and the public. The diversion targets are to be approved for use by the Steering Committee, and used to calculate the quantities of waste to be diverted from the waste stream.

iii) **Waste Disposal**: Estimate total capacity required for disposal for the study period, and determine a proposed total landfill size requirement based on projected capacity needs.

iv) **Future Waste Markets**: Assess current markets in terms of trends and future availability, capacity, and potential for handling materials that would be generated by 3Rs programs within the study area, including potential markets for compost and waste exchange (this information may be available through the MOE).

4.5. Implementation Framework:

Identify needs for policies, agreements, legal entities, legislative amendments, authority by-laws, etc., which may be necessary for participating municipalities to implement an integrated 3Rs system and waste disposal system (eg. 3Rs policies, compensation policy, Board of Management Agreement, upper tier municipal authority, access agreements).

4.6. Task 1 Report:

A brief report will be prepared at the completion of Task 1. This report should include: a full description of the study area; the area problems and opportunities; the existing waste management system; any adjacent area waste management planning studies and interactive opportunities (eg. 3Rs); and, the present and projected waste quantities, types and generation and diversion rates. The report should adequately address the existing system (i.e. "null alternative") and provide a rationale for proceeding beyond the present system, in terms of needs, concerns, regulatory requirements, and provincial goals and objectives, for example.

The report, in draft, will be received and reviewed by the Steering Committee (which includes the Public Liaison Committee and the MOE) after the activities and the work program of Task 1 have been completed. The draft report will be presented to the public, and review agencies.

5. TASK 2 - DIVERSION STRATEGY AND SYSTEM DEVELOPMENT

This phase of the study is intended to develop a 3Rs strategy and system plan. Potential waste diversion system options will be evaluated, reasonable options selected, and the preferred waste diversion system detailed. The system will be documented in a waste diversion plan.

As the planning study proceeds, every effort should be made to implement at-source 3Rs activities. Steps towards implementation of municipal 3Rs facilities, identified in the plan, may be initiated once the completed plan is approved.

5.1. Waste Management Component Technologies/Operations:

i) **Describe Potential System Components**: Describe waste management system components which could be considered as potential components of any waste diversion system for the study area. The descriptions should be clear and understandable to the public (generic information will be available through the MOE).

The descriptions should include generic technical documentation and detail such as: state-of-the-art assessments; capital and operating costs; manpower requirements; potential barriers to the use of the component; and, potential generic environmental impacts.

ii) **Screening Process and Component Selection**: Develop screening criteria, and a screening method, with public input, for determining the feasibility and reasonableness of including specific components within the proposed system. Apply the criteria to select components. The criteria for the study should be reviewed by the public and agencies, and adopted by the Steering Committee prior to their use (generic criteria may be provided by the MOE).

iii) **Develop Recommendations**: Develop a recommendation on which diversion system components could be reasonably included in the development of system alternatives, based on the above screening process.

5.2. Diversion System Identification:

Identify and develop a diversion system option, or options, by amalgamating previously identified 3Rs waste management system components into an appropriate diversion system

alternative. A waste management system alternative could include:

i) modification of a current system; or,

ii) establishment of a new waste management system with a phasing out of the existing system.

If more than one diversion system alternative is identified, a methodology should be established, approved, and used to evaluate and select a preferred system. This methodology should include the development of evaluation criteria, with public input, and an appropriate evaluation procedure.

5.3. 3Rs Facility Siting Process:

Develop a procedure which will be used in Task 3 to select sites for specific 3Rs components of the diversion system. This procedure should be based on established MOE site selection criteria for 3Rs facilities, if available, and/or study-specific criteria developed through a process involving public input.

The procedure should be documented, and approved by the Steering Committee, with input from the MOE. The method for selecting 3Rs facility sites should be developed through public consensus before being applied.

If 3Rs facility siting is subject to EAA, the siting methodology will be required to be developed in accordance with EA requirements.

5.4. Diversion System Strategy:

A waste diversion strategy and 3Rs system plan will be prepared to include: documentation of the 3Rs strategy for the study area; documentation of the selection of the preferred system; detailed description of the selected system; documentation of monitoring and administrative needs. This plan will be submitted to the Steering Committee, and Council(s), for approval of the system recommendations, as well as to agencies and the public, for information.

This strategy, once adopted by the proponent, will be submitted to the Ministry for approval. When approved, it will be the basis for 3Rs system and facilities implementation in Task 3. It will also be the basis for the development of the integrated Systems Plan, as necessary.

6.0 TASK 3 - 3Rs SYSTEM IMPLEMENTATION

Task 3 will involve the selection of 3Rs facility sites, based on the siting approach developed in Task 2, with continued agency and public input.

6.1. 3Rs Facility Siting:

Using the siting approach developed in Task 2 for the selection of sites for the 3Rs components of the approved waste diversion system, undertake the selection of sites. Public consultation will continue in accordance with the siting approach developed and approved. The results of the siting process will be documented in a site selection report for the adopted by the Steering Committee and Council(s).

7.0 TASK 4 - WASTE MANAGEMENT SYSTEM PLAN DEVELOPMENT

Task 4 involves the development of the Waste Management System Plan document. The System Plan will include the adopted diversion system. It will also integrate the diversion system plan with other components and activities necessary for an integrated municipal system, including the handling and disposal of residual wastes.

The document will be submitted along with the landfill site selection methodology document, for EA review. It will document the planning and decision-making process, including the public consultation program.

PART A:

7.1. Disposal System Requirements:

Prior to developing the integrated Plan, the system requirements for residual waste disposal will need to be determined. A disposal system framework will be developed, including decisions on the number of sites to be required to handle the amounts of waste not otherwise diverted, along with the manner by which these materials will be transported, transferred, processed and handled and disposed.

7.2. Siting Methodology Development:

Develop, and present for Committee approval, a landfill siting methodology for the study area, including the criteria which are to be used for site identification, evaluation and selection. The methodology should be developed through a consensus-building process, involving public input throughout. In addition, government agency advisory committee input will be a key component of the methodology development.

The methodology to be developed may include the following:

a) a procedure for the identification/validation of data sources;
b) identification and evaluation criteria;
c) an evaluation approach(es);
d) a procedure for the identification of candidate areas and sites;
e) a procedure for candidate site evaluation and selection;
f) a procedure for preferred site evaluation; and,
g) a procedure for re-evaluating criteria definition and application, without invalidating any previously obtained approvals, if no site is initially found.

The methodology for selecting a landfill site must be developed in a manner consistent with the EA Act. An assessment of the advantages/disadvantages of each site, based on a net environmental effects analysis, using established selection and evaluation criteria, must be included. Full consideration must be given to any mitigative/enhancement measures, and the net effects remaining on all components of the "environment".

The methodology must clearly describe the public consultation program associated with site selection, indicating how the public will be consulted at specific points in the process, and how public concerns will be addressed.

Some field investigations may be required to assist in the selection, substantiation or confirmation of the final selection of a preferred site(s) (i.e. an EA level of detail). Additional site specific investigations for EPA approvals may be considered, if it can expedite the review and approval of and EA/EPA submission, after the Committee, and Council(s), have accepted the recommendation of a preferred site(s).

7.3. Site Selection Methodology Document:

A landfill site selection document (SMD) is to be developed, based on the siting methodology approved. The document should outline the methodology to be used in Task 5, for the subsequent selection of a preferred site, or sites, as well as the consultation plan to be followed.

The document will be submitted to the Steering Committee for review and agreement, and made available to the public and agencies for their review and comment. A final document will be prepared based on the comments received, and resubmitted to the Steering Committee for their final adoption. The document may then be submitted to the MOE for review under the EA Act.

PART B:

7.4. Development of the System Plan:

After the preferred waste diversion system is identified and adopted by the Steering Committee and participating municipalities, the consultant will complete the System Plan document.

The Plan will fully describe an integrated waste management system, and associated programs and activities, by identifying and incorporating any other system components required in addition to the 3Rs facilities. The Plan will outline how the system can be best implemented. The Plan will also include the agreed-upon methodology for the siting of the 3Rs facilities.

The consultant will also include the following:

i) detailed descriptions of associated municipal waste reduction and reuse programs;

ii) description of facilities in order of preference of development;

iii) recommended changes to present financial and administrative practices;

iv) possible changes required in local legislative authority;

v) the recommended plan for the financing of facility development and the operations of a sustainable waste management system;

vi) a detailed implementation schedule, and budgets for facility development and approvals, including any required hearings; and,

vii) an identified procedure for updating the 3Rs strategy and waste diversion system plan, which should include identification of criteria or guidelines to incorporate future facilities/technologies into the proposed waste management system.

This Plan will have incorporated and responded to any additional input from both the public and government review agencies.

The completed planning document will detail the preferred system, including a comparison with the "null" (do nothing) alternative, and a method for selecting 3Rs facility sites. It will form a part of the rationale (i.e. need and "alternatives to") for subsequent environmental assessment approvals of a landfill as an undertaking in accordance with the EA Act.

8.0 TASK 5 - LANDFILL SITE SELECTION

Landfill site selection will be in accordance with the methodology and consultation program adopted. Once the preferred site location is selected, a site selection report will be prepared. This report will form the basis for a submission for EAA/EPA approvals of the preferred site.

8.1. Landfill Siting:

Undertake the identification, evaluation, and selection process for determining a preferred site(s) for the study area, based on the approved methodology. Public input will continue throughout the process, as per the program prescribed and approved.

The consultant will prepare a draft report on the results of the siting process, leading to the recommendation of a preferred site(s), for the approval of the Steering Committee, and Council(s).Upon acceptance of the report, indicating that the process has been successfully completed but not yet reviewed, this report will be made available for agency review, and public review through the Public Liaison Committee, or the Public Liaison Facilitator.

The site selection report will be finalized after a review period, taking into account the comments and concerns expressed by reviewers and the public. The report must document how these comments were addressed. The final report will be used in the preparation of the EA documents.

8.2. EA Document Preparation and Submission:

An EA Summary document will describe the landfill undertaking for which approval is sought and will outline what approvals are being sought.

The EA submission to the Minister should include the WMSP document, the site selection report, and the EA Summary document for the undertaking. The submission may also include any other discipline-specific documents, or other requirements identified in the EA Act, policies, and regulations.

APPENDIX D

WASTE MANAGEMENT APPROVALS REQUIREMENTS [a]

APPROVAL		FACILITIES AND ACTIVITIES
NO APPROVAL		• At source separation program • Blue Box program • Home composting program • Education program • Integrated recycling sites • Recyclable material users
EPA Part V	Permit-by-rule [b]	**Recycling Site** • Deinking • Gypsum (drywall) • Multi-material • Wood **Composting Site** • Leaf and yard material
	Certificate of Approval Application/EPA	• Household Hazardous Waste Program • Landfill site < 40 000 m^3 [d] • Processing/treatment site < 200 TPD [c] • Transfer station <300 TPD
EAA/EPA		• Landfill site > 40 000 m^3 [d] • Processing/treatment > 200 TPD [c] • Transfer station > 300 TPD

[a] Other Ministry approvals that may be required include water and air approvals.
[b] See Initiatives Paper No. 1
[c] 200 TPD figure refers to amount of "residue" that is sent for disposal
[d] 40,000 m^3 considered the equivalent of a site serving 1,500 people